

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

JAN 2 7 2016

REPLY TO THE ATTENTION OF:

Mr. Kurt Blizzard GM Lansing Grand River Assembly MS 489-066-055 920 Townsend Street Lansing, Michigan 48933

RE: 40 CF

40 CFR §761.61(c) Approval

AOI-33 Interim Corrective Measures

General Motors Van Slyke Complex, Flint, Michigan

MID 005 356 951

Dear Mr. Blizzard:

On January 13, 2016, you requested that the U.S. Environmental Protection Agency approve your December 9, 2015 Proposed Interim Corrective Measures for Area of Interest (AOI) 33 under the risk-based disposal provisions of the polychlorinated biphenyl (PCB) regulations at 40 Code of Federal Regulations (CFR) §761.61(c). Under the Toxic Substances Control Act (TSCA) delegation 12-5, the Regional Administrator has redelegated her authority to the Director of the Land and Chemicals Division.

The Interim Corrective Measures proposed include the excavation, sampling and off-site disposal activities for soils contaminated with PCBs and Semi-Volatile Organic Compounds (SVOCs) found at and near at the SB-12 location of AOI 33 located at the Van Slyke Complex in Flint, Michigan. General Motors, LLC (GM) is conducting cleanup and corrective action measures under a Resource Conservation and Recovery Act 3008(h) Administrative Order on Consent. EPA provided email comments to GM on December 16, 2015. GM responded to EPA's comments with a revised Proposed Interim Measures Work Plan on January 15, 2015. EPA's Project Manager has approved the Proposed Interim Corrective Measures Work Plan under the Administrative Order on Consent, subject to the necessary approval under TSCA.

EPA is approving GM's cleanup and disposal of these PCB Remediation Wastes under 40 CFR § 761.61(c) with the following conditions:

- 1) GM will remove PCB impacted soils from the AOI 33 SB-12 area for off-site disposal and perform post-excavation confirmation sampling as described in the January 15, 2016 Work Plan.
- 2) PCB remediation waste ≥ 50 milligrams per kilogram (mg/kg) will be disposed of off-site based on in-situ concentrations in accordance 40 CFR § 761.61(a)(5)(i)(B)(2)(iii).

- 3) PCB remediation waste at concentrations of < 50 mg/kg PCB will be disposed of off-site based on in-situ concentrations in accordance with 40 CFR § 761.61(a)(5)(i)(B)(2)(ii) and (a)(5)(v)(A).
- 4) Sampling and analysis will be conducted in accordance with the approved RCRA Corrective Action Quality Assurance Project Plan.

This approval only addresses the excavation, verification sampling, and off-site disposal of PCB remediation wastes. GM is responsible for ensuring continued compliance with this approval, all applicable provisions of TSCA and the federal PCB regulations. Any departure from the conditions set forth in this letter or the December 9, 2015 Memorandum, referenced above, must receive prior written authorization from the Remediation and Reuse Branch of the Land and Chemicals Division. This Approval does not constitute a determination by EPA that the transporters or disposal facilities selected by GM are authorized to conduct the activities set forth in the Memorandum. GM is responsible for ensuring that it has selected transporters and disposal facilities that are authorized to conduct these activities in accordance with all applicable federal, state, and local statues and regulations. This letter does not relieve GM from compliance with any other federal, state or local regulation and does not preclude EPA from initiating any enforcement action, including an action seeking civil penalties for any violation of federal regulations.

If you have any questions regarding this matter, please contact Peter Ramanauskas, of my staff, at (312) 886-7890.

Sincerely,

Margaret M. Guerriero

Director

Land and Chemicals Division

MEMO



TO:

Kurt Blizzard (GM)

FROM:

Matt Stuk

DATE:

January 15, 2016

SUBJECT:

Proposed Interim Corrective Measures Work Plan AOI-33 - Geotechnical Boring SB-12 GM Van Slyke Complex – Flint, Michigan

COPIES:

ARCADIS PROJECT NUMBER: B0064437.0015

As part of pre-construction activities associated with the proposed Body Shop to be constructed at the General Motors LLC (GM) Van Slyke complex in Flint, Michigan, geotechnical borings were completed within the construction footprint during June 2015. The geotechnical boring locations (SBs) are shown on Figure 1. Soil samples were collected from the borings for waste characterization purposes. In addition, if visual evidence of potential impact was observed (e.g., staining, elevated photoionization detector readings), a sample was collected to be analyzed for the full parameter list associated with the ongoing RCRA Facility Investigation (RFI) at the Site. Staining was noted in the 3.5 to 4-foot depth interval in geotechnical boring SB-12; therefore, a sample was collected for analysis. As shown on Table 1, the soil contaminant concentrations greater than applicable Michigan Part 201 generic cleanup criteria were PCBs and phenanthrene (metals and volatile organic compound results are not shown in Table 1; however, the concentrations were below applicable generic cleanup criteria). Based on the PCB and phenanthrene concentrations present in the sample, SB-12 was identified as Area of Interest (AOI) 33 for RFI purposes.

Additional soil borings were completed during October 2015 to delineate the extent of PCBs and SVOCs around SB-12. Borings were located approximately 20 feet north, south, east, and west of SB-12 (identified as BSGB_SB_12N, BSGB_SB_12S, BSGB_SB_12E, and BSGB_SB_12W, respectively). In addition, a boring was completed directly adjacent to the original SB-12 location (BSGB_SB_12R) to verify the initial soil sample concentrations. The boring locations are shown on Figure 2. The sample results are shown in Table 1. As shown in Table 1, the only PCB or SVOC concentration greater than applicable generic cleanup criteria was the sample collected from the original SB-21 boring. Although the PCB concentration in the sample collected from replicate boring BSGB_SB_12R was much lower than the PCB concentration in the sample collected from SB-12, the higher sample concentration from the SB-12 boring was used to evaluate proposed interim corrective measures.

Based on the significant decrease in PCB concentrations as shown in the samples collected from the borings completed 20 feet from SB-12, it is assumed that the extent of PCB concentrations in soil above applicable generic cleanup criteria are limited to an area relatively close to SB-12. This is also evident by the lower PCB concentration in the sample from boring BSGB_SB_12R, which was located approximately 2 feet from SB-12.

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Removal of the soil with PCB and/or SVOC concentrations greater than applicable generic cleanup criteria is proposed as a proposed interim corrective measure prior to the start of construction of the Body Shop. Therefore, it is proposed that soil within a 5-foot radius of SB-12 will be excavated to a depth of approximately 4 feet below ground surface (the bottom depth of the initial soil sample from SB-12) as shown on Figure 2 (note that Figure 2 is not to scale). If, after removing the anticipated volume of soil, visual evidence of impact is observed (e.g., staining or elevated photoionization detector readings), additional soil will be removed. If a significant amount of visually impacted soil is encountered, work will be stopped to reevaluate soil conditions and determine the next steps. The EPA will be notified immediately in this case.

Upon completing the excavation, confirmation soil samples will be collected to ensure that sufficient soil has been removed. Two soil samples will be collected from the base of the excavation, and two samples will be collected from each sidewall location: one from the 0-2' depth interval, and one from the 2-4' depth interval. The soil samples will be analyzed for PCBs and SVOCs.

If one or more soil samples show that soil with PCB and/or SVOC concentrations above applicable generic cleanup criteria remains, the excavation will be advanced two feet in the direction of the sample(s) that showed the exceedance, and an additional soil sample or samples will be collected and analyzed for PCBs and SVOCs. Soil excavation will be deemed complete when the excavation sidewall and floor samples show no PCB or SVOC concentrations above applicable generic cleanup criteria.

The soil will be stored in a roll-off dumpster for further characterization prior to disposal. After proper characterization, the soil will be transported off site for disposal at a licensed disposal facility.

The anticipated schedule to complete the tasks listed above is as follows:

- January 19/20, 2016: excavation, confirmation soil sampling
- January 21 February 4, 2016: soil sample analysis
- February 5, 2016: soil analysis evaluation, determination of completion
- February 6, 2016: excavation backfill (assuming confirmation samples are below screening levels, and assuming contractor availability)

Sincerely,

-Matt

Matt Stuk PG CPG | Senior Geologist / Certified Project Manager | matt.stuk@arcadis-us.com ARCADIS U.S., Inc. | 101 S. Washington Square, Suite 400 | Lansing, MI, 48933 mobile: 734.604.2289

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Tables

TABLE 1 SB-12 AREA SOIL SAMPLE RESULTS GM VAN SLYKE COMPLEX -FLINT, MI

Sample Location:

Sample Date:

SB-12

		December 30, 2013 Part 201 Generic Cleanup Criteria								
				December 30, 2013	Fait 201 Generic Cle	еапир Спітепа				
		C	Groundwater Protection	on	Indoor Air	Ambient A	Contact			
Parameters Units		Residential Drinking Water Protection Criteria	Drinking Water Drinking Water		Soil Volatilization to Indoor Air Inhalation Criteria	Infinite Source Volatile Soil Inhalation Criteria (VSIC)	Particulate Soil Inhalation Criteria	Direct Contact Criteria		
Polychlorinated Biphenyls (PCBs)	1	,					,			
Polychlor Aroclor-1016 (PCB-1016)	mg/kg									
Polychlor Aroclor-1221 (PCB-1221)	mg/kg									
Polychlor Aroclor-1232 (PCB-1232)	mg/kg									
Polychlor Aroclor-1242 (PCB-1242)	mg/kg		NU I			040		40		
Polychlor Arcsler 4054 (PCB-1248)	mg/kg	NLL	NLL	NLL	16000	810	6500	16		
Polychlor Arcelor 1254 (PCB-1254)	mg/kg									
Polychlor Aroclor-1260 (PCB-1260) PCB-1262	mg/kg	1								
PCB-1262 PCB-1268	mg/kg mg/kg	†								
Semi-Volatile Organic Compounds (SVOCs)	9,119	<u> </u>		<u> </u>	<u> </u>		<u> </u>			
1,2,4,5-Tetrachlorobenzene	mg/kg	1500	1500	3.4	1100	270	29000	250000		
1,2-Diphenylhydrazine	mg/kg	NA NA	NA	NA	NA	NA NA	NA	NA		
2,2'-Oxybis(1-chloropropane) (bis(2-Chloroisoprop	mg/kg	NA	NA	NA	NA	NA	NA	NA		
2,3,4,6-Tetrachlorophenol	mg/kg	NA	NA	NA	NA	NA	NA	NA		
2,4,5-Trichlorophenol	mg/kg	39	110	NA	NLV	NLV	1.0E+07	73000		
2,4,6-Trichlorophenol	mg/kg	2.4	9.4	0.3	NLV	NLV	1.3E+06	3300		
2,4-Dichlorophenol	mg/kg	1.5	4.2	0.3	NLV	NLV	2.3E+06	3900		
2,4-Dimethylphenol	mg/kg	7.4	20	7.6	NLV	NLV	2.1E+06	36000		
2,4-Dinitrophenol	mg/kg	NA	NA	NA	NA	NA	NA	NA		
2,4-Dinitrotoluene	mg/kg	0.4	0.6	NA	NLV	NLV	20000	220		
2,6-Dinitrotoluene	mg/kg	NA	NA	NA	NA	NA	NA	NA		
2-Chloronaphthalene	mg/kg	NA	NA	NA	NA	NA	NA	NA		
2-Chlorophenol	mg/kg	0.9	2.6	0.36	800	1100	5.3E+05	4500		
2-Methylnaphthalene	mg/kg	57	170	4.2	4900	1800	2.9E+05	26000		
2-Methylphenol	mg/kg	NA	NA	NA	NA	NA	NA	NA		
2-Nitroaniline	mg/kg	NA	NA	NA	NA	NA	NA	NA		
2-Nitrophenol	mg/kg	0.4	1.2	ID	NLV	NLV	ID	2000		
3&4-Methylphenol	mg/kg	NA 0.0	NA 0.0	NA 0.0	NA NA	NA	NA 2000	NA 00		
3,3'-Dichlorobenzidine	mg/kg	2.0	2.0	2.0	NLV	NLV	8200	30		
3-Nitroaniline	mg/kg	0.3	0.6	0.5	NLV	NLV	100000	1000		
4,6-Dinitro-2-methylphenol	mg/kg mg/kg	110 NLL	310 NLL	NA NLL	NLV NLV	NLV NLV	1D 110000	240000 32		
4-Bromophenyl phenyl ether 4-Chloro-3-methylphenol	mg/kg	5.8	16	0.28 NLV		NLV	110000 ID	15000		
4-Chloroaniline	mg/kg	NA	NA		NA NA		NA	NA		
4-Chlorophenyl phenyl ether	mg/kg	NA NA	NA NA	NA NA		NA NA	NA NA	NA NA		
4-Nitroaniline	mg/kg	NA NA	NA	NA	NA	NA	NA NA	NA		
4-Nitrophenol	mg/kg	NA	NA	NA			NA	NA		
Acenaphthene	mg/kg	300.0	880	8.7	350000	97000	6.2E+06	130000		
Acenaphthylene	mg/kg	5.9	17	ID	3000	2700	1.0E+06	5200		
Acetophenone	mg/kg	30.0	88	ID	210000	52000	1.4E+07	150000		
Anthracene	mg/kg	41.0	41	ID	1000000	1600000	2.9E+07	730000		
Atrazine	mg/kg	0.06	0.06	0.15	NLV	NLV	ID	330		
Benzaldehyde	mg/kg	NA	NA	NA	NA	NA	NA	NA		
Benzo(a)anthracene	mg/kg	NLL	NLL	NLL	NLV	NLV	ID	80		
Benzo(a)pyrene	mg/kg	NLL	NLL NLL		NLV	NLV	1900	8		
Benzo(b)fluoranthene	mg/kg	NLL	NLL NLL		ID	ID	ID	80		
Benzo(g,h,i)perylene	mg/kg	NLL	NLL NLL		NLV	NLV	3.5E+05	7000		
Benzo(k)fluoranthene	mg/kg	NLL	NLL	NLL	NLV	NLV	ID	800		
Biphenyl (1,1-Biphenyl)	mg/kg	640.0	1800	NA	NLV	NLV	ID	1000000		
bis(2-Chloroethoxy)methane	mg/kg	NA	NA	NA	NA	NA	NA	NA		
bis(2-Chloroethyl)ether	mg/kg	0.1	0.17	0.10	44	13	12000	58		
bis(2-Ethylhexyl)phthalate (DEHP)				NLL	NLV	NLV	8.9E+05	12000		
Butyl benzylphthalate (BBP)				120	NLV	NLV	2.1E+07	120000		
Caprolactam	mg/kg	120.0	340	NA	NLV	NLV	2.9E+05	310000		

e:	7/1/2015	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15
ո։	3.5-4	2.5-3.5	24-25	2.5-3.5	23-25	1-2	15-16	2-3	9-10	2.5-3.5	24-25
_							· · · · · · · · · · · · · · · · · · ·				
L	2.5 UY	0.2 U	0.0091 U	0.02 U	0.0091 U	0.02 U	0.0091 U	0.0091 U	0.0091 U	0.03 U	0.0091 U
L	2.5 UY	0.2 U	0.005 U	0.02 U	0.005 U	0.02 U	0.005 U	0.005 U	0.005 U	0.03 U	0.005 U
L	2.5 UY	0.2 U	0.007 U	0.02 U	0.007 U	0.02 U	0.007 U	0.007 U	0.007 U	0.03 U	0.007 U
	2.5 UY	0.2 U	0.005 U	0.02 U	0.005 U	0.02 U	0.005 U	0.005 U	0.005 U	0.03 U	0.005 U
	2.5 UY	0.2 U	0.005 U	0.02 U	0.005 U	0.02 U	0.005 U	0.005 U	0.005 U	0.03 U	0.005 U
L	27 Y	1.1	0.005 U	0.08	0.005 U	0.4	0.005 U	0.005 U	0.005 U	0.2	0.005 U
	2.5 UY	0.2 U	0.005 U	0.02 U	0.005 U	0.02 U	0.005 U	0.005 U	0.005 U	0.03 U	0.005 U
ſ	NA	0.2 U	0.005 U	0.02 U	0.005 U	0.02 U	0.005 U	0.005 U	0.005 U	0.03 U	0.005 U
I	NA	0.2 U	0.005 U	0.02 U	0.005 U	0.02 U	0.005 U	0.005 U	0.005 U	0.03 U	0.005 U
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
	7 UX	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U					
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
Ļ	1.3 JX	0.051	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U				
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
ļ	4 UX	0.064	0.1 U	0.1 U	0.1 U	0.1	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
ļ	4 UX	0.064	0.1 U	0.1 U	0.1 U	0.1	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
ļ	4 UX	0.1	0.1 U	0.1 U	0.1 U	0.3	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
ļ	4 UX	0.042	0.1 U	0.1 U	0.1 U	0.1	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U
ļ	4 UX	0.1	0.1 U	0.1 U	0.1 U	0.3	0.1 U	0.1 U	0.1 U	0.056	0.1 U
ļ	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
ļ	4 UX	0.1 U	0.1 U	0.1 U	0.058	0.1 U					
ļ	4 UX	0.1 U	0.1 U	0.1 U	0.098	0.1 U					
ļ	7 UX	0.2 U	0.2 U	0.2 U	0.2 U	0.2 U					
ļ	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					
L	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.1 U					

BSGB_SB_12R | BSGB_SB_12R | BSGB_SB_12N | BSGB_SB_12N | BSGB_SB_12N | BSGB_SB_12W | BSGB_SB_12E | BSGB_SB_12E | BSGB_SB_12E | BSGB_SB_12S | BSGB_SB_12S |

TABLE 1 SB-12 AREA SOIL SAMPLE RESULTS GM VAN SLYKE COMPLEX -FLINT, MI

SB-12

								•	SW VAN SLYKE COMPLI
		Groundwater Protection			Indoor Air	Ambient A	ir (Y) (C)	Contact	
				Groundwater		Infinite Source			Sample Location:
Parameters	Units	Residential Drinking Water Protection Criteria	Nonresidential Drinking Water Protection Criteria	Surface Water Interface Protection Criteria	Soil Volatilization to Indoor Air Inhalation Criteria	Volatile Soil	Particulate Soil Inhalation Criteria	Direct Contact Criteria	Sample Date:
Falameters	Office	Totodion ontono	r recession entena				omona		Sample Depth:
SVOCs (cont.)				1		•			
Carbazole	mg/kg	9.4	39	1.1	NLV	NLV	78000	2400	
Chrysene	mg/kg	NLL	NLL	NLL	ID	ID	ID	8000	
Dibenz(a,h)anthracene	mg/kg	NLL	NLL	NLL	NLV	NLV	ID	8	
Dibenzofuran	mg/kg	ID	ID	1.7	3600	160	2900	ID	
Diethyl phthalate	mg/kg	110.0	320	2.2	NLV	NLV	1.5E+06	550000	
Dimethyl phthalate	mg/kg	1500.0	4200	NA	NLV	NLV	1.5E+06	1000000	
Di-n-butylphthalate (DBP)	mg/kg	960.0	2700	11	NLV	NLV	1.5E+06	87000	
Di-n-octyl phthalate (DnOP)	mg/kg	100000.0	290000	ID	NLV	NLV	1.4E+07	20000	
Fluoranthene	mg/kg	730.0	730	5.5	1000000	890000	4.1E+06	130000	
Fluorene	mg/kg	390.0	890	5.3	1000000	150000	4.1E+06	87000	
Hexachlorobenzene	mg/kg	5.4	5.4	ID	ID	ID	ID	3100	
Hexachlorobutadiene	mg/kg	26.0	72	0	710	460	1.8E+05	470	
Hexachlorocyclopentadiene	mg/kg	320.0	320	ID	56	60	5900	6700	
Hexachloroethane	mg/kg	0.43	1.2	1.8	79	660	1.0E+05	730	
Indeno(1,2,3-cd)pyrene	mg/kg	NLL	NLL	NLL	NLV	NLV	ID	80	
Isophorone	mg/kg	15	62	26	NLV	NLV	8.2E+06	22000	
Naphthalene	mg/kg	35	100	0.7	470	350	8.8E+04	52000	
Nitrobenzene	mg/kg	0.33	0.33	3.60	170	64	2.1E+04	340	
N-Nitrosodi-n-propylamine	mg/kg	0.33	0.33	NA	NLV	NLV	2.0E+03	5	
N-Nitrosodiphenylamine	mg/kg	5.4	22	NA	NLV	NLV	2.8E+06	7800	
Pentachlorophenol	mg/kg	0.022	0.022	27	NLV	NLV	1.3E+05	320	
Phenanthrene	mg/kg	56	160	2.1	5100	190	2900	5200	
Phenol	mg/kg	88	260	9.0	NLV	NLV	1.8E+07	230000	
Pyrene	mg/kg	480	480	ID	1000000	780000	2.9E+06	84000	
L									

Concentrations in cells shaded yellow are greater than one or more Part 201 Cleanup Criteria. The criteria that were exceeded in one or more samples are highlighted in blue.

Sample Date:	7/1/2015	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15	10/12/15
Sample Depth:	3.5-4	2.5-3.5	24-25	2.5-3.5	23-25	1-2	15-16	2-3	9-10	2.5-3.5	24-25
	4 UX	0.1 U									
	1.9 JX	0.07	0.1 U	0.1 U	0.1 U	0.1	0.1 U				
	7 UX	0.2 U									
	4 UX	0.1 U									
	7 UX	0.1 U									
	4 UX	0.1 U									
	7 UX	0.2 U									
	7 UX	0.2 U									
	2.9 JX	0.2	0.1 U	0.1 U	0.1 U	0.3	0.1 U	0.1 U	0.1 U	0.056	0.1 U
	2.7 JX	0.031	0.1 U								
	4 UX	0.1 U									
	4 UX	0.1 U									
	4 UX	0.1 U									
	4 UX	0.1 U									
	4 UX	0.1 U	0.1 U	0.1 U	0.1 U	0.101	0.1 U				
	4 UX	0.1 U									
	4 UX	0.1 U									
	4 UX	0.1 U									
	4 UX	0.1 U									
	4 UX	0.1 U									
	4 UX	0.1 U									
	9 X	0.105	0.1 U	0.1 U	0.1 U	0.2	0.1 U				
	4 UX	0.1 U									
	6 X	0.1	0.1 U	0.1 U	0.1 U	0.2	0.1 U				
_		·	·			·	·				

BSGB_SB_12R | BSGB_SB_12R | BSGB_SB_12N | BSGB_SB_12N | BSGB_SB_12W | BSGB_SB_12W | BSGB_SB_12E | BSGB_SB_12E | BSGB_SB_12E | BSGB_SB_12S | BSGB_SB_12S

U - Not detected at the associated reporting limit

J - Estimated concentration.

UJ - Not detected; associated reporting limit is estimated

X - Elevated reporting limit due to matrix interference Y - Elevated reporting limit due to high target concentration

Concentrations in shaded cells are greater than one or more Part 201 Cleanup Criteria

[&]quot;ID" means insufficient data to develop criterion

[&]quot;NA" means a criterion or value is not available or, in the case of background and CAS numbers, not applicable "NLL" means hazardous substance is not likely to leach under most soil conditions

[&]quot;NLV" means hazardous substance is not likely to volatilize under most condition

ARCADIS

Figures



